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Attorneys for Respondents
CHEVRON CORPORATION and CHEVRON U.S.A.
INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE APPLICATION OF THEOPHILUS G.
METSAGHARUN, *et al.* FOR AN ORDER
GRANTING LEAVE TO ISSUE
SUBPOENAS FOR THE TAKING OF
DISCOVERY PURSUANT TO 28 U.S.C.
1782

No. CV 12 80 274 MISC RS (KAW)

**STIPULATION AND [PROPOSED]
ORDER CONTINUING HEARING
AND SETTING BRIEFING
SCHEDULE**

Courtroom: 4
Judge: Hon. Kandis A. Westmore

In accordance with Local Rule 7-12, the parties in the above-captioned action, through their respective counsel, stipulate as follows:

Whereas Applicants Theophilus G. Metsagharun, Jackson Omareye, Lofty Ogbe, Bawo Omadeli and Gbejule Okoturo filed an Application for Discovery Pursuant to 28 U.S.C. § 1782 on November 29, 2012 (the “Application”);

Whereas, before the case was assigned, Applicants noticed the Application for hearing on Tuesday, January 11, 2013, at 10:00 a.m.;

Whereas Applicants and Respondents Chevron Corporation and Chevron U.S.A. Inc. (together “Respondents”) agree that the hearing date and briefing schedule should be modified to

1 accord with the Court's Standing Orders and the parties' respective schedules, and in order to
2 allow the parties adequate time to meet and confer;

3 IT IS HEREBY STIPULATED THAT:

- 4 1. The hearing for the Application shall be continued to January 17, 2013 at 11:00
5 a.m.;
- 6 2. Respondents' Opposition brief shall be due no later than January 4, 2013;
- 7 3. Applicants' Reply brief shall be due no later than January 10, 2013.
- 8

9 Pursuant to Local Rule 5-1(i)(3), I, David L. Wallach, attest that concurrence in filing this
10 document has been obtained from the other signatory.

11 Dated: December 17, 2012

JONES DAY

13 By: /S/ David L. Wallach

14 David L. Wallach

15 Counsel for Respondents
16 CHEVRON CORPORATION and
CHEVRON U.S.A. INC.

17 Dated: December 17, 2012

EARTHRIGHTS INTERNATIONAL

19 By: /S/ Richard Herz

20 Richard Herz (*pro hac vice*)

21 Counsel for Applicants
22 THEOPHILUS G. METSAGHARUN,
23 ET AL.

24 PURSUANT TO THE FORGOING STIPULATION, IT IS SO ORDERED THAT:

25 The hearing and briefing schedule are modified as set forth above.

26 Dated: _____

27 The Honorable Kandis A. Westmore